

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

HODELL-NATCO, INC.	)	CASE NO. 1:08CV2755
	)	
Plaintiff,	)	JUDGE WELLS
	)	MAGISTRATE WHITE
vs.	)	
	)	
SAP AMERICA, INC., et al.,	)	<u>AMENDED REPORT OF PARTIES'</u>
	)	<u>PLANNING MEETING UNDER</u>
Defendants.	)	<u>FED.R.CIV.P.26(f) AND LR 17.3(b)</u>
	)	
	)	
	)	

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on June 16, 2011, and was attended by: P. Wesley Lambert, counsel for Plaintiff; Roy A. Hulme, counsel for Defendant(s) LSI-Lowery Systems, Inc. and the IBIS Group, Inc.; and Gregory J. Star, counsel for Defendant, SAP America, Inc. and SAP AG.

2. The parties:

  X   have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and the Court's prior order; or

       will exchange such disclosures

       have not been required to make initial disclosures

3. The parties recommend the following track:

       Expedited   X   Standard        Complex

       Administrative        Mass Tort

4. This case:

  X   is suitable for electronic filing

       is not suitable for electronic filing

5. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

\_\_\_\_\_ Early Neutral Evaluation

\_\_\_\_\_ Mediation

\_\_\_\_\_ Summary Jury Trial

\_\_\_\_\_ Summary Bench Trial

\_\_\_\_\_ Arbitration

  x   Case not suitable for ADR  
at **this time**

6. The parties:

\_\_\_\_\_ do consent to the jurisdiction of the United States  
Magistrate Judge pursuant to 28 U.S.C. § 636 (c).

  X   do not consent to the jurisdiction of the United States  
Magistrate Judge pursuant to 28 U.S.C. § 636 (c).

7. Recommended Discovery Plan:

- (a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Estimate of 12 to 15 fact witness depositions and three to five expert witness depositions. Exchange of Interrogatories, documents and electronically stored information.

- (b) Recommended Discovery cut-off date:

Fact discovery:	<u>November 15, 2011</u>
Plaintiff expert report due:	<u>December 15, 2011</u>
Defendant expert reports due:	<u>January 15, 2012</u>
Plaintiff rebuttal expert reports due:	<u>January 30, 2012</u>
Expert discovery to be complete:	<u>March 1, 2012</u>

8. The parties:

  X   expect to use expert witnesses in this case

\_\_\_\_\_ do not expect to use expert witnesses in this case

9. Recommended dispositive motion date: March 15, 2012

10. Recommended cut-off date for filing any motion to amend the pleadings and/or to add additional parties: August 17, 2011

11. Other matters for the attention of the Court:

Signatures:

/s/ P. Wesley Lambert  
Attorney for Plaintiff(s):

Hodell-Natco Industries, Inc.

/s/ Roy A. Hulme  
Attorney for Defendant(s):

LSI-Lowery Systems, Inc.  
The IBIS Group, Inc.

/s/ Gregory J. Star  
Attorney for Defendant(s)

SAP America, Inc.  
SAP AG

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of June 2011, a copy of the foregoing was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ P. Wesley Lambert

P. WESLEY LAMBERT (0076961)